

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STEPHEN IDE, et al., on behalf of themselves
and all others similarly situated,

Plaintiff,

v.

BRITISH AIRWAYS, PLC (UK),

Defendant.

Case No. 1:20-cv-03542-JMF

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT, PRELIMINARY
DETERMINATION REGARDING
CLASS CERTIFICATION, AND
APPROVAL OF NOTICE AND
CLAIMS PLAN**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs Stephen Ide, Karen Steele-Clarke, and Donald Dominique Jr. hereby move the Court to enter the proposed Preliminary Approval Order, which: (1) preliminarily approves the class action Settlement reached in the matter; (2) preliminarily certifies the Settlement Class; (3) appoints Plaintiffs Ide, Steele-Clarke, and Dominique as the Class Representatives; (4) appoints Shanon J. Carson and John G. Albanese of Berger Montague PC and Adam Polk, Scott Grzenczyk, and Tom Watts of Girard Sharp LLP as Co-Lead Counsel for the Settlement Class; (5) approves the proposed notice plan and issuance of notice to Settlement Class Members; (6) sets forth procedures for opting out of or objecting to the Settlement; (7); schedules a Final Approval Hearing to consider final approval of the Settlement.

In support of her Motion, Plaintiffs rely on the concurrently-filed Memorandum of Law in support thereof, the exhibits attached thereto, and the other filings and documents present in the record.

Respectfully submitted,

Dated: May 20, 2022

/s/ Adam E. Polk

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